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cc:

Subject: Re: VB/I70 Meeting to Discuss Exterior Lead Based Paint Abatement

Hello All:

My recollection is that we contemplated lead based paint abatement on properties where soils exceeded the lead standard for the purpose of preventing further soil contamination after the remedy had been implemented. This is consistent with OSWER Guidance and this was to be voluntary on the part of the homeowner.

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>>> <Ketellapper.Victor@epamail.epa.gov> 10/21/2004 1:04:15 PM >>>

As a portion of the remedy for OU-1 of the VB/I70 site, the ROD considers exterior lead based paint abatement to protect the soil replacement remedy. To implement this portion of the remedy, a standard

is being developed to assess and conduct exterior lead based paint abatement. In developing this standard, several legal/programmatic issues have arisen which could impact how the remedy is implemented. It

is urgent to begin discussing this issues so that the can be dicussed during the next working group meeting. I would like to meet during the

week October 25 to discuss and resolve these issues. Please reply to this message with your availability to meet during this week.

#### Background

Exterior lead based paint assessments have been conducted on 15 homes that had soil cleanup completed at the VB/I70 Site. These homes were selected to represent a cross section of the types of lead based paint abatement issues that would be seen at this project. From this assessment, the following legal/programmatic issues were identified:

1. Which homes should be considered for exterior lead based paint abatement? All homes which a soil clean up was completed (lead or arsenic) or only homes which the soil exceeded the lead clean up level.

The ROD estimated that 843 properties would require a soil cleanup.  
335

properties of these properties would exceed the lead cleanup standard, 508 properties exceed the standard for arsenic only.

2. Would exterior lead based paint abatement address the risk of recontaminating the clean soil or protect children from exterior lead based paint hazards.

3. Is the lead based paint abatement voluntary for those properties that qualify? If not, what would be done if the homeowner refuses allow the exterior lead based paint abatement to be conducted?

These issues impact the cost of the cleanup. My estimate of the exterior lead based paint abatement costs for the different options are as follows:

Lead soil properties only, soil protection (335 properties) - \$500,000

Lead Soil properties only, protect children (335 properties) - \$1,200,000

All properties with soil removal, soil protection (843 properties) - \$1,300,000

All properties with soil removal, protect children (843 properties) - \$3,000,000

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